

## **PERMIT CONDITIONS**

Cavco Industries Inc  
Permit Number 96-0674  
February 20, 1997

*The numerical section references in this Permit are based on Maricopa County Air Pollution Control Rules and Regulations (Rules) in effect on the date of issuance of these Permit Conditions. In the event that these rules are revised to change the numerical references during the term of this Permit, the revised numbering system will apply to this permit.*

### **GENERAL CONDITIONS:**

1. **Annual Compliance Certification:** The Permittee shall file an annual compliance certification with the Maricopa County Department of Environmental Services (Department), Attn: Air Quality Compliance Supervisor. The compliance certification shall be filed on a form and in the manner specified by the Maricopa County Air Pollution Control Officer (Control Officer).
2. **Certification:** Any document which is required to be submitted by this Permit or the Rules shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
3. **Controls:** Except as provided by the applicable Rules or these Permit Conditions, the Permittee shall not operate any equipment or process unless air pollution controls, required by either this Permit or the Rules, are in place, are operating without bypass, and are operating within their design parameters and in accordance with any other conditions specified in this Permit. This requirement to operate any required air pollution control equipment may be temporarily waived:
  - a. for good cause if advanced written approval is obtained from the Control Officer, or
  - b. for preventative maintenance of the control device if the shutdown is allowed in the control's Operation and Maintenance Plan which has been approved in writing by the Control Officer.

The Permittee shall notify the Control Officer, in accordance with Rule 220, before making any additions, modifications or replacements to any air pollution control equipment. This notification requirement does not apply to normal maintenance and repair activities.
4. **Fees:** The Permittee shall pay, in a timely manner, an annual fee for this Permit as determined by the Control Officer in accordance with Rule 280.
5. **Fugitive Dust:** The Permittee shall take all reasonable precautions to minimize the emissions of fugitive dust in accordance with §300 of Rule 310.

6. **Leased/Rented/Borrowed Equipment:** If the Permittee leases, rents, or lends any equipment covered by this permit to a second party, the Permittee shall provide the second party with a copy of this Permit. It is the responsibility of the person using the equipment to make sure that the equipment is properly permitted and operated. If the Permittee does not provide the second party with a copy of this Permit, both the Permittee and the second party shall be responsible for operating the source in compliance with the Permit and for any violation thereof.
7. **Maintenance:** The Permittee shall keep all equipment under this Permit in good working order through an active maintenance program established in accordance with the approved Operation and Maintenance Plans or, in its absence, with manufacturers' recommendations, and generally accepted industry standards.
8. **Malfunctions (Emergency Upsets):** A malfunction that causes emissions in excess of those allowable by either the Rules or these Permit Conditions shall constitute a violation. Any affirmative defense of a violation caused by a malfunction shall be documented in accordance with §501 of Rule 100.
9. **Material Containment:** Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.
10. **Modifications:** The Permittee shall notify the Control Officer, in accordance with the Rules, of changes, replacements or additions to the source which are not covered by this Permit.
11. **Odors:** The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.
12. **Operations:** The Permittee shall operate all equipment and processes in accordance with these Permit Conditions, applicable approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.  
The Permittee shall halt or reduce activities if necessary in order to maintain compliance with these Permit Conditions, all approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.
13. **Portable Sources:** If this Permit is for a portable source, the Permittee shall notify this Department, Attn: Air Quality Compliance Supervisor, in writing at least ten days in advance of moving to any location in Maricopa County. The notification shall include, at a minimum, the information required by §410 of Rule 200.

If the proposed location will have additional sources of air pollution under the control of the Permittee, the notification shall also contain a summary of the projected and allowable emissions for these additional sources.

The ten day notification requirement may be waived if both of the following conditions are met:

- a. the Permittee can demonstrate to the satisfaction of the Control Officer that an emergency situation existed, and
- b. the Permittee notifies the Department of the required information by telephone as soon as is practical and follows up with a written copy within seven days.

The Permittee shall submit any fees required by Rule 280 at the time that the notification is filed.

If the Permittee obtains an air quality permit from the Arizona Department of Environmental Quality (ADEQ) for any source covered by this Permit, the Permittee shall provide a copy of the ADEQ permit to the Department within 30 days of its issue.

14. **Record Keeping:** The Permittee shall maintain accurate records as required by these Permit Conditions and by Section 500 of all applicable Rules. These records will be kept in a form which allows easy verification of compliance with these Permit Conditions and any applicable Rules.

All records shall be kept for a minimum of three years except that all records required to demonstrate that an air pollution control device is being operated properly shall be retained for five years.

All records required by this Permit shall be made available for inspection upon request by a representative of the Control Officer.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this permit.

15. **Renewal:** The Permittee shall file an application for a permit renewal at least six months, but not more than 18 months, before the expiration date of this Permit.

16. **Reopening For Cause:** This Permit shall be reopened or revised prior to expiration under any of the following conditions:
  - a. either the Control Officer or the Administrator of the United States Environmental Protection Agency (Administrator) determines that this Permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of this Permit, or
  - b. either the Control Officer or Administrator determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.

17. **Reporting:** If notified, the Permittee shall submit an annual emissions inventory report to the Control Officer. The report shall summarize the activities and air pollution emissions from the facility during the previous calendar year in accordance with §507 of Rule 100. The report shall be filed on a form supplied by the Control Officer and shall be due by April 30 or 90 days after the Control Officer makes the forms available, whichever is later.

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising or revoking and reissuing this Permit or to determine compliance with this Permit.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this Permit.

The Permittee shall file any additional reports required by the Control Officer in a complete and timely manner.

18. **Right to Entry:** The authorized representative of the Control Officer, upon presentation of credentials, shall be permitted:
- a. to enter upon the premises where the source is located or emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this Permit, and
  - b. to have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this Permit, and
  - c. to inspect any source, at reasonable times, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required in this Permit, and
  - d. to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements, and
  - e. to record any inspection by use of written, electronic, magnetic, and photographic media.

No claim of confidentiality for trade secrets or commercial information available to the Permittee under Arizona Revised Statutes (ARS) 49-487 or Rule 200 §400 can limit the scope of or otherwise interfere with an on-site inspection by a representative of the Control Officer.

19. **Rights and Privileges:** This Permit does not convey any property rights nor exclusive privileges of any sort.
20. **Severability:** The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.
21. **Start-up Notification:** The Permittee shall give written notification to the Department, Attention Compliance Supervisor, at least 7 days but no more than 30 days before the initial start-up of any new equipment or process. Start-up shall be defined as the use of any equipment or process covered by this Permit in a manner that emits or controls a regulated air pollutant. However, startup shall not be considered as having occurred if the equipment or process is operated solely for the purpose of calibration or test runs.

This startup notification does not apply to processes or equipment recognized by the Control Officer as being trivial or insignificant activities.

22. **Temporary Equipment:** The Permittee shall notify the Control Officer and obtain appropriate approval, in accordance with the Rules, prior to the installation or operation of any temporary or contractor operated equipment not covered by this Permit.

**SPECIFIC CONDITIONS:**

23. **Allowable Emissions:** The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Daily Emissions Limit	Twelve Month Rolling Average Annual Emissions Limit
Total Volatile Organic Compounds (VOCs)	205 pounds	37 tons
Any Single Hazardous Air Pollutant (HAP)	27 pounds	4.9 tons
Total Hazardous Air Pollutants (HAPs)	70 pounds	12.49 tons
Particulate Matter Smaller Than 10 Microns (PM <sub>10</sub> )	1 pound	365 pounds
Total Suspended Particulate Matter (TSP)	5 pounds	1825 pounds

The twelve month rolling average shall be calculated at the end of each calendar month by summing the emissions over the most recent twelve calendar months.

24. **Material Limitations:** The Permittee shall not use any wood coating with a VOC content, less water, nonprecursor solvents and any colorant added to tint bases, above 2.1 pounds of VOC per gallon of coating.
25. **Controls:**  
Surface Coating:
- All surface coating operations shall be conducted utilizing an application method with a coating transfer efficiency of at least 65% as certified by the manufacturer and accepted by the Control Officer.
  - The Permittee shall conduct all spray coating operations inside an enclosed area or areas.
  - The Permittee shall conduct spray coating operations in such a manner that ensures that at least 96% of the over spray remains within the enclosure.

Woodworking:

The Permittee shall not operate and exhaust any non-hand held sawing, sanding or routing equipment unless it is exhausted, without bypass, to a properly functioning dust collector achieving a control efficiency  $\geq 80\%$  for particulate matter. For the purposes of this Permit Condition, a properly functioning dust collector shall be defined as one that is operating within the parameters specified in its approved Operation and Maintenance Plan.

26. **Operation and Maintenance Plan:** The Permittee shall submit an approvable Operation and Maintenance (O&M) Plan to the Department, which specifies key system operating parameters and equipment maintenance procedures and schedules, for the dust collector. The O&M plan shall be submitted within 30 days of the issuance of this permit.

27. **Record Keeping:** The following lists and records shall be kept in a complete and consistent manner:

Surface Coating:

- a. **Current List:** The Permittee shall maintain a current list of VOC containing materials used for surface coating operations at the facility, stating the VOC content of each in either pounds per gallon or grams per liter.
- b. **Materials:** The Permittee shall maintain monthly records showing the type, amount, and VOC content, expressed as either pounds per gallon or grams per liter, of each coating, adhesive, makeup solvent, cleaning solvent and any other material from which VOCs evaporate during the preparation for and application of surface coatings. Upon request, the Permittee shall make available daily VOC emissions calculations by dividing the monthly VOC emissions by the number of days that surface coating operations were performed during that month.
- c. **Operations:** The Permittee shall keep a record of the days on which surface coating operations were performed.
- d. **Disposal:** The Permittee shall keep records of the disposal of VOC containing material. Records of hazardous waste disposal shall be kept in accordance with hazardous waste disposal statutes.
- e. **Training:** The Permittee shall keep a log demonstrating that all training requirements of these Permit Conditions are being met.

Woodworking:

The Permittee shall maintain records of the quantity of particulate matter generated by the exhausted process equipment and collected by the dust collector.

28. **Training:** The Permittee shall fully train all individuals before they are allowed to operate any surface coating equipment. Training shall include, at a minimum, proper application techniques, cleaning procedures, and equipment setup and adjustment as well as record keeping, VOC containment and VOC disposal requirements. Refresher training shall be given at least annually.

29. **Gasoline Storage:**

Allowable Emissions:



The Permittee shall not allow emissions of VOCs into the atmosphere from the gasoline storage and vehicle fueling operations to exceed 600 pounds per month nor more than 2,400 pounds per year.

Allowable Throughput:

The Permittee shall limit gasoline throughput to less than 30,000 gallons per month and less than 120,000 gallons per year.

Control Parameters:

The Permittee shall not allow gasoline to be transferred into the storage tank unless the storage tank is equipped with a submerged fill pipe, the end of which is totally submerged when the liquid in the tank is six inches from the bottom of the tank.

Record Keeping:

The Permittee shall maintain accurate records showing the quantity of all gasoline delivered to the facility and shall record the total received during each month.

30. **Other:**

- a. **Spray Equipment Cleanup:** The Permittee shall not use materials containing VOCs in the cleanup of the spray equipment used in surface coating operations unless:
  - 1. The equipment is disassembled and cleaned in a solvent vat which is closed when not in use, or
  - 2. The used cleaning compounds are collected in a container which is closed when not in use and the solvent is disposed of in a manner which does not allow it to evaporate into the atmosphere, or
  - 3. Cleaning is done by other methods which have been approved in writing by the Control Officer.

- b. VOC Containment and Disposal: The Permittee shall take all reasonable measures to keep VOCs from evaporating into the atmosphere including, but not limited to:
  - 1. All materials from which VOCs can evaporate, including coatings, fresh solvent, used solvent, waste solvent and solvent soaked rags and residues shall be stored in closed containers when not in use. Such containers one gallon and larger shall be legibly labeled with their contents. VOC containing materials shall be disposed of in closed containers.
  - 2. All containers and mixing tanks containing VOCs shall be leak free and shall be kept covered except when the materials are being transferred or when the containers are being cleaned.

**Amended Permit Conditions for  
Cavco Industries, Inc. - Durango Plant  
Permit Number 96-0674  
Non-Minor Permit Revision Number NM97-008  
September 25, 1997**

**The following permit conditions amend the corresponding permit conditions in the existing Permit Number 96-0674. If there is a conflict between these permit conditions and those issued previously, these permit conditions will take precedence.**

**SPECIFIC CONDITIONS:**

23. **Allowable Emissions:** The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Daily Emissions Limit	Twelve Month Rolling Average Annual Emissions Limit
Total Volatile Organic Compounds (VOCs)	300 pounds	49.95 tons
Any Single Hazardous Air Pollutant (HAP)	30 pounds	4.9 tons
Total Hazardous Air Pollutants (HAPs)	75 pounds	12.49 tons
Particulate Matter Smaller Than 10 Microns (PM <sub>10</sub> )	1 pound	365 pounds
Total Suspended Particulate Matter (TSP)	5 pounds	1825 pounds

The twelve month rolling average shall be calculated at the end of each calendar month by summing the emissions over the most recent twelve calendar months.